



The Competitive Carriers Association

**Rural Cellular Association**

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November 18, 2011

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WT Docket No. 11-18; WT Docket No. 06-150; WT Docket No. 11-186; RM-11592; RM-11497**

Dear Ms. Dortch:

On November 17, 2011, Steven K. Berry, President and CEO of RCA; Tim Donovan, VP of Legislative Affairs of RCA; In-Sung Yoo, Assistant Regulatory Counsel of RCA; and I met with Mark Stone, Chief of Staff to Commissioner Michael J. Copps. The parties discussed the urgent need for interoperability in the 700 MHz band as a means to ensure competition in the wireless industry.<sup>1</sup> This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

RCA urged the FCC to restore interoperability across the 700 MHz band and most immediately in the lower portion of the band. As supported by the economic study, "Non-Interoperability at 700 MHz: Lower Revenues & Higher Prices," the lack of interoperability in the 700 MHz band continues to harm consumers, industry, and the economy as a whole. Specifically, the economic study concludes that the continuation of non-interoperability will result in a number of negative outcomes regarding revenues and federal budget contributions from future spectrum auctions; the potential to fulfill the goal of ubiquitous mobile broadband; and competition, innovation, and pricing in the wireless market. The Commission should consider all avenues to immediately correct the harms caused by a lack of interoperability.

Sincerely,

/s/

Rebecca M. Thompson  
General Counsel

cc: Mark Stone

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<sup>1</sup> See e.g., Press Release, Cox Communications, Cox Communications to Discontinue Cox Wireless Service, Effective March 30, 2012 (Nov. 15, 2011), available at <http://cox.mediaroom.com/index.php?s=43&item=569>.